



# PUBLIC NOTICE

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## WTB SEEKS COMMENT ON WIRELESS E911 PHASE II WAIVER REQUEST

FILED BY VERIZON WIRELESS

CC DOCKET NO. 94-102

**Comments Due: August 21, 2001**

**Reply Comments Due: August 31, 2001**

Federal Communications Commission (Commission) rules require wireless carriers to begin to deploy the capability to identify the precise location of wireless 911 calls beginning on October 1, 2001, provided that certain conditions are met.<sup>1</sup> This capability is called Phase II Automatic Location Identification (ALI). The Phase II rules establish deployment schedules and set accuracy and reliability requirements for both handset-based and network-based ALI technologies.<sup>2</sup>

On July 25, 2001, Verizon Wireless requested a limited waiver of the Phase II rules to permit it to deploy a network-assisted Global Positioning System/Advanced Forward Link Trilateration (AGPS/AFLT) handset solution for its CDMA broadband PCS network E-911 Phase II solution on a schedule that deviates from the schedule contained in the Commission's rules.<sup>3</sup> In seeking a waiver, Verizon Wireless states that it is persuaded that AGPS/AFLT is the best solution available and will move forward to deploy that solution as aggressively as possible. It will be unable to meet the Commission's rules' deadlines for Phase II compliance, however, because the network updates and Phase II-capable handsets will not be available in time and therefore seeks relief from current Phase II implementation deadlines. Specifically, Verizon Wireless seeks relief to:

- Begin deploying the network-assisted portion of AGPS/AFLT by October 1, 2100 in its switches and cell sites for Lucent markets; January 1, 2002 for Nortel markets; and November 1, 2002 for Motorola markets.
- Complete deployment of these network upgrades by April 1, 2002 for Lucent markets; August 30, 2002 for Nortel markets; and March 1, 2003 for Motorola markets.

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<sup>1</sup> See 47 C.F.R. §§20.18(e)-(j).

<sup>2</sup> 47 C.F.R. §§20.18(f)-(h).

<sup>3</sup> *Updated Phase II E911 Report and Request for Limited Waiver*, CC Docket 94-102 (filed July 25, 2001) (Verizon Wireless Petition).

- Begin selling AGPS/AFLT Phase II compliant handsets no later than December 31, 2001 and meet the following milestones for new handset activations: 25% of new handsets by July 31, 2002; 50% of new handsets by March 3, 2003; 100% of new handsets by December 31, 2003; and 95% of embedded base by December 31, 2005.

Verizon Wireless also indicates that it plans to pursue two separate, further technologies to provide enhanced location capability earlier to bridge the transition to AGPS/AFLT: (1) installation of an interim network-based hardware technology in three metropolitan areas on an interim basis beginning in the Fall 2001 (St. Louis, Chicago and Houston markets); and (2) continued testing of Enhanced Forward Link Trilateration (ELFT), which has demonstrated that it can locate callers on average between 250-350 meters, without the assistance of modified handset and, if testing proves successful, to deploy EFLT in those markets utilizing Lucent and Nortel switches.

Verizon Wireless states that in its November 9, 2000 Phase II E911 Report it chose a network-based technology based on the status of development of location technology and the expected availability of that technology. Although it developed and tested the network-based technology, "based on all available information, Verizon Wireless has determined that the AGPS/AFLT handset solution will provide the best and most ubiquitous location capability while presenting fewer of the problems that surfaced with the network technology."<sup>4</sup> Thus, Verizon Wireless states that approval of its comprehensive plan will serve the public interest by permitting it to provide its customers with what it believes is the most accurate location technology as quickly as possible.

We seek comment on this waiver request. Parties interested in filing comments may do so on or before August 21, 2001 and may file reply comments on or before August 31, 2001.

This is a "permit but disclose" proceeding pursuant to § 1.1206 of the Commission's Rules.<sup>5</sup> Presentations to or from Commission decision-making personnel are permissible provided that *ex parte* presentations are disclosed pursuant to 47 C.F.R. § 1.1206(b).

Comments may be filed using the Commission's Electronic Comment Filing System (ECFS) or by filing paper copies. Comments filed through the ECFS can be sent as an electronic file via the Internet to <http://www.fcc.gov/e-file/ecfs.html>. In completing the transmittal screen, commenters should include their full name, Postal Service mailing address, and the docket number of this proceeding. Parties that choose to file by paper must file an original and four copies of each filing with the Office of the Secretary, Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Washington, D.C. 20554, and a diskette copy with the Commission's copy contractor International Transcription Service, Inc. (ITS), Room CY-B400, Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Washington, D.C. 20554. The filing should include the docket number of this proceeding: CC Docket No. 94-102. Filings and comments are also available for inspection and copying during regular business hours in the Reference Information Center, Federal Communications Commission, Court Yard Level, Room CY-A257, 445 12<sup>th</sup> Street, S.W., Washington, D.C. or may be purchased from ITS.

For further information concerning this proceeding, contact Jane Phillips, Policy Division, Wireless Telecommunications Bureau, at (202) 418-1310.

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<sup>4</sup> Verizon Wireless Petition at 3.

<sup>5</sup> 47 C.F.R. § 1.1206.